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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re THE LITIGATION PRACTICE GROUP P.C., Debtor.	Case No. 8:23-bk-10571-SC Chapter 11 VERIFIED MOTION OF R. REED PRUYN FOR ADMINISTRATIVE EXPENSE BAR DATE: NOVEMBER 21, 2023
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I respectfully submit this Verified Motion for Administrative Expense (“*Motion*”) declaring under penalty of perjury and the laws of the U.S.A. these supporting facts:

1. As a priority administrative expense, I am owed salary for the vital services I rendered as legal counsel to many clients of the Debtor, The Litigation Practice Group P.C. (“*LPG*”), rendered by me after LPG commenced this bankruptcy case on March 20, 2023.

2. Sections 503(b) and 507(a)(2) of Title 11 of the United States Bankruptcy Code provide for allowance of administrative expense priority claims including actual, necessary costs and expenses of preserving the estate, including wages, salaries and commissions for services rendered after the commencement of such a case.

3. Exhibit 1 to this Motion, filed contemporaneously herewith, is evidence of my salaried employment agreement which remained constant: before, as of the date LPG filed this case, and continuing thereafter. It includes the initial agreement effective as of October 1, 2021 (memorialized in e-mail), an illustrative October/November 2021 paystub, an illustrative

1 January/February 2023 paystub, and the employment agreements with LPG-affiliate entities
2 that worked extremely hard to continue servicing LPG clients after LPG filed this case.
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4 4. To any relevant extent, my salary was negotiated and set based on the fact that
5 since about the second half of 2020, and all of 2021 up to October of that year, I had been
6 receiving—and would continue to receive—at least 50 and sometimes well over that many
7 cases per month for clients in Utah, Colorado and Idaho; the most in one month was 80. And
8 all the several years I have been doing this work, through to the present, I have typically spent
9 about 55 to 63 hours per week exceptionally servicing clients: during the ‘workweek,’ hours
10 have ranged from about 10 to 12 per day, from about 6 to 7 a.m. to about 6 to 7 p.m.; and
11 during the weekend, aggregate hours have ranged from about 3 to 12.
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14 5. In April 2023, LPG asked me to reactivate my California law license, because
15 help of an apparent emergent nature was needed to assist a host of clients in that jurisdiction
16 facing imminent proceedings in pending litigation. Of course I willingly did so, because that
17 is what I do: help in every way and the best I can, which has always been the foundation for
18 my professional career.
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20 6. On about May 4, 2023, LPG assigned me 68 California cases, a docket I
21 immediately organized and started working on—in addition to those ongoing in the Rocky
22 Mountain West. To shed light on how much work was necessary in a compressed time this
23 past summer, a considerable number of cases were slated for July, August or September trials.
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25 7. My last LPG-affiliated check for was for pay period ending May 12, 2023.
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27 8. Saturday afternoon June 3, 2023, the Chapter 11 Trustee through his counsel
28 reasonably assured me that “...no one expects you [me] to work *pro bono* involuntarily...”

1 9. Until I am paid my salary from May 13, 2023 through the day before the
2 August 4, 2023 sale—a sale for which in June and July I submitted supporting declarations
3 upon request of the Trustee and which I incorporate into this Motion by way of this
4 reference—the fact remains I involuntarily worked *pro bono* for those three months—twelve
5 weeks, six pay periods to be exact—in spite of greatly benefitting the Estate by delivering
6 sterling dutiful service to clients.¹ Indeed, many California clients would have been defaulted
7 and not received the legal assistance they needed on short notice had it not been for me.
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10 10. I respectfully request the Court grant this Motion.

11 Dated: November 21, 2023

/s/ Reed Pruyn
R. Reed Pruyn

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¹ My spouse and I also lost our health insurance at the end of June because of the bankruptcy.